IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

3M COMPANY,	§
	§
Plaintiff,	§
	§ CIVIL ACTION NO. 03-2651 JRT/FLN
V.	§
	§
INTERTAPE POLYMER GROUP,	§ DEFENDANTS' MOTION FOR
INC., IPG(U.S.) HOLDINGS INC.,	§ SUMMARY JUDGMENT
IPG (U.S.) INC. and CENTRAL	§
PRODUCTS COMPANY,	§
	§ ORAL ARGUMENT REQUESTED
Defendants.	§

TO: Plaintiff 3M Company, and its attorneys Timothy M. Kenney, Fulbright & Jaworski, 2100 IDS Center, 80 South Eighth Street, Minneapolis, Minnesota 55402; Louis T. Pirkey and William G. Barber, Fulbright & Jaworski, 600 Congress Avenue, Suite 2400, Austin, Texas 78701; Thomas Tinkham, Esq., Dorsey & Whitney LLP, 50 South Sixth Street, Minneapolis, Minnesota 55402

Defendants Intertape Polymer Group, Inc., IPG(U.S.) Holdings Inc., IPG (U.S.) Inc. and Central Products Company, hereby move the Court for an Order granting Summary Judgment in their favor pursuant to Fed. R. Civ. P. 56, on the ground that there is no genuine issue as to material fact and Defendants are entitled to judgment as a matter of law.

This Motion is based upon all the records, files, and proceedings herein, together with the accompanying Memorandum of law and supporting Affidavit.

May 4, 2005

Respectfully submitted,

ARTHUR, CHAPMAN, KETTERING SMETAK & PIKALA, P.A.

/s/ Thomas A. Forker

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Scott A. King (admitted Pro Hac Vice) Victoria L. Nilles (admitted Pro Hac Vice) THOMPSON HINE LLP 2000 Courthouse Plaza, N.E. P.O. Box 8801 Dayton, OH 45401-8801 (937) 443-6600 Attorneys for Defendants